APPENDIX F

ROCKAWAY DELIVERY LATERAL PROJECT
SPILL PREVENTION, CONTROL, AND COUNTERMEASURES PLAN

Spill Prevention, Control, and Countermeasures Plan
(SPCC Plan)

Rockaway Delivery Lateral Project

March 2013

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1.0 GENERAL INFORMATION

1.1 PROJECT LOCATION AND DESCRIPTION

This Spill Prevention Control and Countermeasures Plan (Spill Plan) was developed for the Rockaway Delivery Lateral Project (Project), which would extend approximately 3.20 miles from a proposed offshore interconnect with Transcontinental Gas Pipe Line Company, LLC's (Transco's) existing 26-inch diameter Lower New York Bay Lateral (LNYBL) in the Atlantic Ocean to an onshore delivery point for the National Grid pipeline system on the Rockaway Peninsula in Queens County, New York. The offshore portion of pipeline construction will occur entirely within the Atlantic Ocean, which is the only waterbody that could be affected by spills during construction.

As part of the offshore construction planning process, Transco will ensure that any vessel operators performing the work have appropriate plans in place to comply with United States Coast Guard requirements including a Vessel Response Plan (VRP) or a Shipboard Oil Pollution Emergency Plan (SOPEP) as contained in 33 CFR 151 and 33 CFR 155. The specific plan requirements depend on the size of the vessel and the type of cargo and the quantity of oil and fuel that will be carried on board.

Definitions:

Oil is defined in the SPCC regulations as oil of any kind or in any form including, but not limited to, petroleum, fuel oil, sludge, oil refuse and oil mixed with wastes other than dredged spoil and oily mixtures.

Hazardous Material is defined by DOT includes hazardous substances, hazardous wastes, marine pollutants, elevated temperature materials, materials designated as hazardous in the Hazardous Materials Table (see 49 CFR 172.101), and materials that meet the defining criteria for hazard classes and divisions in part 173 of subchapter C of this chapter. Hazardous Materials typically found on construction projects include, but are not limited to, petroleum oils, hydraulic fluids, engine coolants (ethylene glycol), x-ray film developer, chemical additives, pipe coatings, used abrasive blasting media, etc.

EPA's definition of a **facility** includes any mobile installation, equipment, or pipeline (other than a vessel) in which oil will be used. This SPCC plan is required if the storage or use of oil at the job site is greater than 1,320 gallons. The boundaries of the facilities covered by this

SPCC plan will include all vessels and barges used during the construction and depend on site-specific factors such as equipment used, types of activities at the site, and staging and fueling areas. This generic SPCC plan provides an overview of the project and proposed operational activities.

Contractor Responsibility:

The Contractor shall be familiar with this Spill Plan and its contents prior to commencing any construction-related activities. The Spill Plan will be followed to prevent any spills that may occur during the project and to mitigate any spills that do occur.

Company representatives assigned to this project include:

District Manager (DM):	TBD
Company Inspector (CI):	TBD
Environmental Compliance:	TBD

2.0 DRAINAGE PATTERNS AND SPILL PREVENTION PRACTICES

2.1 DRAINAGE PATTERNS

The general drainage patterns can be determined by the contour drawings shown in the topographic maps.

Responsibility: Construction Inspector / District Manager

Construction and Operations personnel will be familiar with drainage patterns for the project and be prepared to implement measures to control any release.

2.2 SPILL PREVENTION PRACTICES

The Contractor shall take the following precautions to ensure that any oil or hazardous materials spill does not occur:

A. Containers

(1) All containers shall be stored on level ground at least 100 feet from any waterway, unless the location is designated for such use by an appropriate governmental authority. All containers should be located within temporary containment.

(2) Temporary containment may include temporary hay bale berms with plastic sheets underlining the entire contained area and over the hay bale berms. Earthen materials may be used in place of hay bales with the method of construction determined by the Environmental Inspector. It is at the discretion of the contractor to comply with the conditions of the spill plan, but at a minimum the contractor must comply with the general conditions outlined in the FERC Plan and Procedures and 40 CFR Part 112, although these requirements do not technically apply to the conditions at a construction site.

(3) Containment areas shall be capable of containing 110% of the volume of hazardous materials being stored.

(4) All container storage areas shall be routinely inspected for integrity purposes.

(5) Leaking and/or deteriorated containers shall be replaced as soon as the condition is first detected with clean-up measures immediately taking place.

(6) No incompatible materials shall be stored in the same containment area.

(7) No container storage areas shall be left unsecured during non-work hours. All hoses and oil containing equipment is required to be secured prior to concluding each day. This includes parking and securing equipment as identified in condition A-1 and fueling equipment must have hoses placed into containment and locked with pad and key if possible.

(8) All containers of oil or hazardous materials should be accompanied by oil spill response kits.

(9) Collected rainwater in containment pads must be inspected prior to release to the ground; it must be free of sheens or other hazardous materials.

B. Tanks

(1) The Contractor shall operate only those tanks that meet the requirements and specifications of applicable regulations and that are surrounded with temporary containment as described above.

(2) Self-supporting tanks shall be constructed of materials compatible with its contents.

(3) All tanks shall be routinely inspected for integrity purposes.

(4) Vehicle mounted tanks shall be equipped with flame/spark arrestors on vents to ensure that self-ignition does not occur.

(5) Tanks will not be used to store incompatible materials in sequence unless first thoroughly decontaminated.

(6) Any tank utilized for storing different products between construction locations will be thoroughly decontaminated prior to refilling.

C. Unloading/Loading Areas

(1) If it is necessary during the project, re-fueling and transferring of liquids shall only occur in pre-designated locations that are on level ground and at least 100 feet from any waterway. Where conditions require construction equipment (e.g., Bobcat/front-end loader/excavator) be re-fueled within 100 feet of any waterway, or as prescribed by a project specific permit, this activity must be continuously manned to ensure that overfilling, leaks or spills do not occur. In addition, all this equipment must be surrounded by temporary containment as described above and inspected on a regular basis to ensure that any hoses or parts containing oil or hazardous materials are in good working order.

(2) All service vehicles used to transport fuel must be equipped with an appropriate number of fire extinguishers and an oil spill response kit. At a minimum, this kit must include:

- Ten, 48”x 3” oil socks
- Five, 18” x 18” oil pillows
- One, 10’x 3” oil boom
- Twenty-five, 24” x 24”oil mats/pads
- 1 box garden-size, 6-mil, disposable polyethylene bags (w/ ties)
- 4 pairs of oil-proof gloves
- One, 55-gallon PE open-head drum
- Blank drum labels

- 2 shovels

(3) Contractors will be trained in proper handling, refueling, and maintenance practices.

D. Offshore

(1) All vessels will be required to register for the EPA Vessel General Permit, which authorizes discharges incidental to the normal discharge of operations of commercial vessels.

(2) Emergency response procedures for offshore spills will be identified after the contractor has been selected.

3.0 EMERGENCY RESPONSE PROCEDURES

This section provides a generic description of emergency response procedures to be performed to address oil and hazardous materials spills at the job site. Each response will vary depending upon the nature and extent of the incident. However, the general procedures outlined below will be followed.

3.1 CONTRACTOR RESPONSIBILITIES

(1) The Contractor must designate both an Emergency Coordinator (EC) and an Alternate EC for the project.

(2) The Contractor is responsible for appropriately addressing all spills that occur directly as a result of construction-related activities.

(3) For spills (spills that take less than a shovel-full of dirt to clean-up), no internal notification requirements of this Spill Plan need to be followed. However, this does not relieve the Contractor from appropriately remediating the area and reporting the spill in the daily report.

(4) The Contractor shall supply the necessary manpower, PPE, and spill response equipment to appropriately address all spills that directly occur as a result of construction-related activities.

(5) Ensure that all emergency spill response equipment and PPE is well-stocked and in good condition. Replace used materials when necessary.

(6) If the situation warrants it, the Contractor shall immediately notify any local emergency spill response contractors for assistance.

(7) The Contractor shall be responsible for hiring an emergency spill response contractor if the nature of the incident requires it.

(8) The Contractor is responsible for immediately notifying the CI (or the DM) of any reportable spills.

3.2 COMPANY RESPONSIBILITIES

(1) Company shall be responsible for ensuring that the Contractor adequately follows the procedures outlined in this Spill Plan at all times.

(2) Company shall be responsible for all verbal and written external notifications made to any regulatory agency or any local emergency responders.

3.3 EMERGENCY CONTACTS

Table I (Appendix A) provides a list of Company and Contractor emergency contacts.

3.4 DUTIES OF COMPANY INSPECTOR (DISTRICT MANAGER) FOR NON-DE MINIMUS SPILLS

The duties of the CI (or DM) for reportable spills include the following:

(1) Determine the source, character, amount, and extent of the spill.

(2) Assess the potential hazards to the job site, environment, and surrounding community and contact the Safety Representative if any hazards are detected.

(3) Evacuate the area if necessary.

(4) Report the spill in accordance with the internal notification procedures outlined in Section 5.1 and the external notification procedures outlined in Section 5.2.

(5) Commit manpower and equipment for minor incidents that can be reasonably remediated by the Contractor.

(6) Oversee Contractor's spill response efforts to contain and control all spills to ensure they adequately follow the procedures outlined in this Spill Plan.

(7) Document the Contractor's response effort, including taking photographs wherever possible.

(8) Generate an Emergency Incident Report (WGP Form 0187).

4.0 EMERGENCY SPILL RESPONSE AND PERSONNEL PROTECTION EQUIPMENT

Table II (Appendix A) provides a list of the minimally-required Emergency Spill Response Equipment and Personnel Protection Equipment (PPE) for this project. This is in addition to the minimally-required spill response equipment previously specified in Section 2.2.

5.0 SPILL NOTIFICATION PROCEDURES

5.1 INTERNAL NOTIFICATIONS

All spills are to be immediately reported to the CI (or DM) who will contact Gas Control and the Environmental Compliance Department. Table I (Appendix A) includes a list of emergency contacts.

An Emergency Incident Report (WGP Form 0187) must be forwarded to the Environmental Compliance Department as soon as technically feasible by the CI (or DM). The Environmental Compliance Department will determine if the spill constitutes the following:

(1) Reportable Quantity under CERCLA,

(2) Reportable release under the Clean Water Act or RCRA, or

(3) Reportable Threshold Quantity under SARA Title III

(4) State Reportable Incident (Contact Environmental Compliance Department)

(5) Immediately Reportable Incident – Any sheen observed on water

If any reporting is necessary, the Environmental Compliance Department shall be responsible for immediately contacting the appropriate federal and state regulatory authorities and following-up in writing, if required. Any spills requiring reporting to state or federal agencies shall also be reported to the impacted landowner.

5.2 EXTERNAL NOTIFICATIONS

Any spills that may pose a threat to human health or the environment shall be immediately reported to the CI (or DM) who will contact the Local Emergency Planning Committee (LEPC) if necessary. When determining if the LEPC should be contacted or not, any gas release to the atmosphere must be taken into consideration. Note: Linear Projects may extend through multiple LEPC jurisdictions. Contractor must insure all jurisdictions are listed.

The appropriate LEPC is:

Name:	TBD
Organization:	TBD
Phone Number:	TBD

The Environmental Compliance Department is responsible for submitting any required written follow-up notifications to the LEPC or any local emergency responders.

5.3 EMERGENCY SPILL RESPONSE CONTRACTORS

The Company has arrangements with several emergency spill response contractors to address emergency responses beyond the capabilities of the Contractor.

If necessary, the following firms could be utilized for this project:

Company:	TBD
Name:	TBD
Location:	TBD
Phone Number:	TBD

Company:	TBD
Name:	TBD
Location:	TBD
Phone Number:	TBD

5.4 LOCAL EMERGENCY RESPONDERS

The Contractor or the CI (or DM) may call the following local emergency responders should their assistance be required: Note: Linear Projects may extend through multiple Emergency Responder areas. Contractor must insure all jurisdictions are listed.

Service	Telephone Number
Emergency Medical Services	TBD
Hospital	TBD
Fire	TBD
U.S. Park Police	TBD
United States Coast Guard	TBD

6.0 CLEAN-UP PROCEDURES

The following section outlines specific procedures to be followed when addressing spills:

6.1 SPILLS

(1) Small spills and leaks must be remediated as soon as feasible. Use adsorbent pads wherever possible.

(2) Restrict spills to the containment area if possible by stopping or diverting flow.

(3) If the spill exceeds the containment structure's capacity, immediately construct additional containment using sandbags or fill material. Every effort must be made to prevent the spills from entering a water body.

(4) If a spill reaches a water body, immediately place oil booms downstream in order to contain the material. As soon as possible, remove the floating layer with absorbent pads.

(5) After all recoverable oil has been collected and drummed, place all contaminated PPE, spill clean-up equipment, and any impacted soil into appropriate containers.

(6) For significant quantities of impacted soils, construct temporary waste piles using plastic sheets. This material should subsequently be transferred into lined roll-off boxes as soon as feasible.

(7) Environmental Compliance Department will coordinate all waste characterization, profiling, and disposal activities.

6.2 EQUIPMENT CLEANING/STORAGE

(1) Upon completion of remedial activities, the Contractor shall be responsible for decontaminating the used emergency response equipment as well as the PPE.

(2) The Contractor shall be responsible for replacing any spent emergency response equipment and PPE prior to resuming construction-related activities.

(3) Decontamination rinse fluids shall be collected and containerized. The Environmental Compliance Department will coordinate waste characterization and disposal activities.

(4) Reusable PPE shall be tested and inventoried prior to being placed back into service.

6.3 WASTE DISPOSAL

The Contractor is responsible for waste management and waste disposal; however, the Environmental Compliance Department will coordinate all waste characterization, profiling, and disposal activities. All waste management and disposal activities shall conform to the procedures outlined in the O&M Manual (see WGP procedure 35.04.01, "Waste Management").

The Contractor is permitted to manage routine garbage and construction debris without oversight of the Environmental Compliance Department

APPENDIX A

TABLE I: LIST OF EMERGENCY CONTACTS

Names	Job Description	Phone Number
Gas Control	GulfStream	800/440-8457 (24-hrs)
	Northwest	800/972-7733 (24-hrs)
	Transco	800/440-8457 (24-hrs)
TBD	Chief Inspector	TBD
TBD	District Manager	TBD
Mark Bisett, Manager	Environmental Compliance Department	713/215-2781 (off) 713/213-2581 (cell)
Contractor	**Job Description**	**Phone Number**
TBD	Emergency Coordinator	TBD
TBD	Alternate Emergency Coordinator	TBD
Regulatory Agencies	**Name**	**Phone Number**
	National Response Center	800/424-8802
	State Environmental Mgt. Dept. (EMD)	TBD
	National Park Service - Kathleen Cuzzolino	718/354-4609

APPENDIX A

TABLE II: EMERGENCY SPILL RESPONSE AND PERSONNEL PROTECTION EQUIPMENT

Equipment	Quantity	Location
(1) chemical spill kit	1	adjacent to work space
(2) oil spill kit	1	adjacent to work space

SPILL RESPONSE EQUIPMENT:

(1)	1 bag loose chemical pulp	3 chemical pillows (18" x 18")
	3 chemical socks (48" x 3")	10 chemical mats/pads (24" x 24")
	1 box garden-sized, 6-mil, disposal polyethylene bags (w/ ties)	
	Blank drum labels	one 30-gallon PE open-head drum
	2 shovels	
(2)	1 oil boom (100' x 3")	10 oil pillows (18" x 18")
	10 oil socks (48" x 3")	25 oil mats/pads (24" x 24")
	1 box garden-sized, 6-mil, disposal polyethylene bags (w/ ties)	
	Blank drum labels	three, 55-gallon PE open-head drums
	4 shovels	

PERSONNEL PROTECTION EQUIPMENT:

The inventory of PPE should include enough for at least 4 responders reacting to a significant leak/spill.

Splash goggles, half-face respirators (w/ cartridges for benzene),
Tyvek suits, nitrile gloves, waterproof/ chemical resistant hip-waders